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DATE: February 14, 1989

TO: John Summers

FROM: Shirli Axelrod SA

SUBJECT: Georgetown PCB Waste and Tank Cleanup; Comments on  
Letter From Morris Environmental to Kamol Lakhakul,  
G&L Construction

I have reviewed the above-referenced letter pertaining to cleaning and removing two of the four tanks at Georgetown under Spec. No. 2928. The procedure provided is incomplete in several significant aspects. It fails to address provisions in our spec, as well as state Department of Ecology (DOE) and local Fire Department requirements.

For example, there are no provisions for inerting the tanks before removal or for capping piping and openings in the tanks. There are no provisions for decontamination of equipment or tools. There is no mention of when to contact the Fire Department regarding the tank permits or the Health Department or DOE prior to excavating to determine whether or not soil can be treated on site. There is no mention of soil sampling. The contract spec requires these and other measures.

Since our spec was written, the Washington DOE has issued Policies and Procedures for Underground Storage Tank Removal (attached). Please transmit a copy to the contractor. I believe our spec is consistent with this guidance; where the guidance goes further than our specs, City Light and our contractor are obliged to comply with it.

The letter submitted by G&L fails to identify who will carry out the procedures and even states vaguely, "Tank removal will be performed by others." (p 2). G&L (or its adviser) should state affirmatively the actions it will take and the actions to be taken by its prime, its agents or its subcontractors such as ESI. City Light cannot approve its submittal in the absence of such statements.

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This submittal is another example of the problems inherent in failing to obtain qualified, experienced contractors to handle SCL tank removal and cleanup of hazardous wastes. Additional work and discussion on EAD's part is necessary for this tank removal. We should discuss specifics as soon as possible.

SA:er

Attachment

cc: Weems  
Wang  
Critz  
Davison  
Best  
Axelrod  
Durrant  
EAD 960  
File

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